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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)
15 Plaintiff,)
16 v.)
17 MATTHEW D. CHILD,)
18 Defendant.)
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No. CR-05-00725 EMC

STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXCLUDE TIME AND
DEFER PROSECUTION

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21 The parties hereby request that the Court exclude time under the Speedy Trial Act
22 in the above captioned case pursuant to 18 U.S.C. § 3161(h)(2) from January 25, 2006 to
23 January 25, 2007 for deferral of prosecution. The parties agree that U.S. Attorney's
24 Office diversion is an appropriate disposition in this matter.

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STIPULATION AND ~~[PROPOSED]~~ ORDER TO EXCLUDE TIME AND DEFER PROSECUTION
CR 05-00725 EMC

1 The United States has placed Mr. Child on U.S. Attorney's Office diversion for a
2 period of one year for Mr. Child to continue counseling programs and demonstrate good
3 conduct. Accordingly, the parties agree that the prosecution will be deferred for a twelve
4 month period of time.

5 SO STIPULATED.

6 KEVIN V. RYAN
United States Attorney

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8 DATED: 3/6/2006

/s/ Derek R. Owens

DEREK R. OWENS
Special Assistant United States Attorney

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11 DATED: 3/2/2006

/s/ Steven Kalar

STEVEN KALAR
Attorney for Mr. Child

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15 ORDER

16 Based on the stipulation of the parties and for good cause shown, IT IS HEREBY
17 ORDERED that time is excluded under the Speedy Trial Act pursuant to 18 U.S.C. §
18 3161(h)(2) from January 25, 2006 to January 25, 2007 for deferral of prosecution by the
19 Government for the purpose of allowing the defendant to demonstrate good conduct
20 under the conditions of a pretrial diversion program.

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22 DATED: March 15, 2006

